

EXHIBIT “A”**RICO STATEMENT****QUESTION # 2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
The MWL & the MWLNY	The MWL is among the world’s largest Islamic charitable organizations, with offices in more than thirty countries. The MWL serves as an umbrella organization for a number of other Islamic charities, commonly referred to as bodies or members of the League, including the IIRO, the World Assembly of Muslim Youth (“WAMY”), al Haramain & al Aqsa Mosque Foundation, Benevolence International Foundation (“BIF”) and the Rabita Trust. The MWL has long operated as a fully integrated component of al Qaida’s financial and logistical infrastructure, and provided material support and resources to al Qaida and affiliated FTOs. The MWLNY is the New York office of the MWL. The MWL has provided substantial material support and resources to al Qaida through its subsidiary bodies, including the IIRO, WAMY, the Rabita Trust, and BIF.	1962(c) 1962(d)
IIRO	The IIRO is a subsidiary body of the MWL, with offices throughout the globe. According to MWL officials, the MWL provides “humanitarian assistance” through the arms of the IIRO. In reality, the IIRO is one of the charities operating within al Qaida’s support infrastructure, and the IIRO has long operated as a fully integrated component of al Qaida’s logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs. According to the recently declassified 1996 CIA report regarding the involvement of Islamic charities in the sponsorship of terrorism, the IIRO funded six al Qaida training camps in	1962(c) 1962(d)

	Afghanistan, including camps from which al Qaida planned, approved and coordinated the Attack, and at which some or all of the September 11 hijackers received indoctrination and training. Moreover, forty to fifty percent of the IIRO's charitable funds were used to finance terrorist training camps in Afghanistan and Kashmir.	
Rabita Trust	The Rabita Trust is a subsidiary body of the MWL, with headquarters in Lahore, Pakistan and offices throughout the world. Rabita was designated by President Bush as an organization that provided logistical and financial support to al Qaida. Rabita Trust was led by defendant Julaidan, a founder of al Qaida. Rabita Trust has, for a period of many years and in diverse regions throughout the world, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad, knowing that such support would result in an attack like the one that occurred on September 11, 2001.	1962(c) 1962(d)
Julaidan	Julaidan, a Saudi citizen, is an associate of Osama bin Laden, having fought with him in Afghanistan in the 1980s, and is a founding member of al Qaida. In February 2000, Julaidan was appointed to the Board of Trustees of the Rabita Trust and served as its director general. On September 6, 2002, the United States Department of Treasury designated Julaidan a Specially Designated Global Terrorist pursuant to Executive Order 13224. In his capacity as an associate of bin Laden, a founder of al Qaida, and the director general of Rabita Trust, Julaidan was a full participant and conspirator in the events leading up to the Attack.	1962(c) 1962(d)